

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

JXN UNDIVIDED COALITION;
MISSISSIPPI VOTES; PEOPLE'S
ADVOCACY INSTITUTE; MISSISSIPPI
POOR PEOPLE'S CAMPAIGN; BLACK
VOTERS MATTER; RUKIA LUMUMBA;
DANYELLE HOLMES; AREKIA BENNETT-
SCOTT,

Plaintiffs,

v.

SEAN TINDELL, in his official capacity as
Commissioner of the Mississippi Department of
Public Safety; and BO LUCKEY, in his official
capacity as Chief of the Capitol Police, a unit of
the Mississippi Department of Public Safety,

Defendants.

Civil Action No. 3:23-cv-351-TSL-RPM

ORAL ARGUMENT REQUESTED

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, Plaintiffs, by and through their attorneys, respectfully move this Court for a preliminary injunction for the reasons set out in the accompanying Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction. As discussed more fully in their Complaint and Memorandum, Plaintiffs challenge the constitutionality of that portion of Senate Bill 2343 that requires them to obtain permission from Defendants prior to engaging in protests, demonstrations, or other events "in any building or property owned or occupied by any official, agency, board, commission, office or other entity of the State of Mississippi, or which can reasonably be expected to block, impede or otherwise hinder ingress thereto and/or egress therefrom."

Plaintiffs submit that they meet the standards for a preliminary injunction, i.e., they have a likelihood of success on the merits, they will be irreparably harmed if the challenged law is permitted to take effect, others will not be substantially harmed by the issuance of the requested injunctive relieve, the public interest will be served by the issuance of the requested injunctive relief, and there is no adequate remedy at law.

In support of their Motion, Plaintiffs submit the following:

- Declaration of Devin Branch (Exhibit A);
- Declaration of Danyelle Holmes (Exhibit B);
- Declaration of Arekia Bennett-Scott (Exhibit C); and
- Declaration of Rukia Lumumba (Exhibit D)

For the reasons stated in the accompanying Memorandum and Complaint, Plaintiffs respectfully submit that the Court should grant this motion and preliminarily enjoin the Defendants from implementing and enforcing the challenged provisions of Senate Bill 2343 until a final hearing on the merits.

Dated: June 3, 2023

/s/ Paloma Wu

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have this day filed the foregoing document with the Southern District of Mississippi's Electronic Court Filing system which sent notification of filing along with a copy of the filed document to all counsel of record in this matter.

Dated: June 3, 2023

/s/ Paloma Wu
Paloma Wu